

United States District Court  
for the Middle District of Alabama

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DEBRA R. HANCOCK, CLERK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

Debra Joyce Clackler 159516

v.

Civil Action Number: 2:06-cv-00172-WHA

Gladys Deese et. al.,

Plaintiff's First Interrogatories to Defendants

Pursuant to Rule 26 and Rule 33 of the Federal Rules of Civil Procedure, plaintiff requests that defendants answer the following interrogatories:

1. Please describe the missed outside medical appointments mentioned on number 9 of Dawn Tumlison's requested information for Warden Albright.
2. Please identify the people responsible for medically clearing inmates for transport to South Louisiana Correctional Center.
3. Please identify the people responsible for making decisions regarding the medical treatment which can and cannot be provided by the medical staff for Alabama inmates who are housed at South Louisiana Correctional Center.

4. Please explain physician's reasons for prescribing donnatal for plaintiff, who was suffering from chronic constipation, when one of its side effects is constipation.

5. Please identify the on-duty nurse at the South Louisiana Correctional Center on February 12, 2005, who refused to see plaintiff and informed Officer Goutreau that there wasn't anything she could do for plaintiff.

6. Please explain physician's reasons for continuing to prescribe provera for plaintiff after noting on her medical records, "not responding to provera."

Done this 31st day of July, 2006.

Debra Joyce Clackler  
Signature of Plaintiff

## Certificate of Service

This is to certify that I have this day served counsel for the opposing parties a copy of the foregoing document by first-class United States mail in a properly addressed envelope with adequate postage thereon. The individuals served are:

Office of the Clerk  
United States District Court  
P.O. Box 711  
Montgomery, AL 36101-0711

Balch & Bingham LLP  
P.O. Box 18668  
Huntsville, AL 35804-8668

Attorney General Troy King  
11 South Union Street, Suite 310  
Montgomery, AL 36130

This 31<sup>st</sup> day of July, 2006.

Debra Joyce Clackler  
Petitioner

**Albright, Frank***If No reply b*

**From:** Tumison, Dawn  
**Sent:** Friday, May 13, 2005 7:41 AM  
**To:** '844adm@asgr.com'  
**Cc:** Tumison, Dawn; Albright, Frank  
**Subject:** Requested Information for Warden Frank Albright  
**Importance:** High

*5/18/05**Advise them that**I needed it by 5/23/05.*

Warden Albright would like medical information concerning the below mentioned inmates as soon as possible. Your responses will need to be written or emailed back to Warden Albright. Thank

*05/17 see**attached**(Pa)  
(dt)*

Deborah Johnson AIS#150359 (medical complaint and last time seen by PHS)  
 Teresa Brooks AIS#187303 (medical condition concerning legs and stomach and last time seen by PHS)  
 Cherry Baker AIS#1822448 (last time seen for sick call screening and any charges for follow up care)  
 Connie Wiggins AIS#233626 (charges for the same visit)  
 Terry Butts AIS#198293 (medical condition concerning lumps in throat and last time seen by PHS)  
 Velveeta Johnson AIS#222528 (medical condition and treatment)  
 Lisa Fretwell AIS#236030 (medical condition, last seen seen by PHS and treatment)  
 Lynda Sides AIS#150446 (status on KOP medication shortage)  
 Gloria Richardson AIS#139059 (medical condition concerning needle in left breast and last time seen by PHS)  
 Debra Clackler AIS#159516 (last time seen by outside physician concerning lipoma and missed outside appointments)  
 Sonya Williams AIS#215778 (appointment for surgery)  
 Cynthia Jones AIS#232772 (meds 3 times a day are being refused by nurses but being charged although chronic care)  
 Ruth Chambers AIS#134196 (charges for visits)  
 Linda Cox AIS#230965 (medical condition and treatment plan)  
 Malikah Shabazz AIS#140301 (copy of MARS)